



U.S. Department of Justice

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

September 11, 2022

**BY ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Mustapha Raji*, 19 Cr. 870 (JMF)**

Dear Judge Furman:

The Government respectfully submits this letter to correct a factual assertion made in the Government's letter submitted on September 9, 2022 (Dkt. No. 107).

In the Government's prior letter, it wrote: "The Government anticipates that CW-1 will testify, in substance, that he reached out to the defendant and told the defendant, in sum and substance, 'I have another job or wire for you,' and the defendant readily understood what CW-1 was asking: for a business bank account into which a fraudulent wire transfer could be sent."

In light of an additional conversation with CW-1 that took place since the submission of the Government's prior letter, the Government writes to correct that statement, as follows: "The Government anticipates that CW-1 will testify, in substance, that he reached out to Dauda Raji, the defendant's brother and co-conspirator, and told him, in sum and substance, 'I have another job or wire.' Immediately thereafter, the defendant contacted CW-1 and offered to provide a business bank account into which a fraudulent wire transfer could be sent."

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/  
Catherine E. Ghosh  
Jilan J. Kamal  
Robert B. Sobelman  
Assistant United States Attorneys  
(212) 637-1114/2192/2616

cc: Jeremy Schneider, Esq. (by ECF)